

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
|-------------------------------|---|-------------------------|
| SUSAN DECUYPER, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No.: 3:13-cv-00850 |
| |) | JURY DEMAND |
| AMY CORS FLINN, ROBERT DAVID |) | JUDGE CAMPBELL / |
| NEBEL, JOY POLLOCK NEBEL, and |) | MAGISTRATE BRYANT |
| SUE RUTA, |) | |
| |) | |
| Defendants. |) | |

MOTION OF AMY CORS FLINN, ROBERT DAVID NEBEL, AND JOY POLLOCK
NEBEL FOR BRIEF EXTENSION OF TIME TO RESPOND TO
AMENDED COMPLAINT

Defendants Amy Cors Flinn, Robert David Nebel, and Joy Pollock Nebel move the Court for a brief extension until Wednesday, December 4, 2013 to timely file their responsive pleading to the plaintiff's recently amended complaint.

Grounds for this motion are that despite defendants' and their counsel's diligent and prompt efforts to gather necessary information to respond and to identify and develop appropriate affirmative defenses, the scope and breadth of the factual allegations and legal theories pleaded in the complaint, along with the copious documents upon which the factual allegations in the complaint are based, have required and continue to require research and review that is not yet complete. Additionally, after naming the Hampton Reserve Homeowners' Association as an involuntary plaintiff, the plaintiff just today voluntarily dismissed that entity. This will require defendants to revise their approach to their responsive pleading. The plaintiff will not be prejudiced by this brief extension.

Accordingly, these defendants request permission to extend the period to timely file their responsive pleading until December 4, 2013.

/s/ Neil M. McIntire
Neil M. McIntire, Esq. 19830
HOWELL & FISHER, PLLC
300 James Robertson Parkway
Nashville, TN 37211
nmcintire@howell-fisher.com
615-244-3370

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 24th day of November 2013 a true and correct copy of the foregoing has been forwarded via the court's electronic filing system to:

Scott Johannessen, Esq.
LAW OFFICES OF SCOTT D. JOHANNESSEN
3200 West End Avenue, Suite 500
Nashville, TN 37203

/s/ Neil McIntire